

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Dominic Ali,
Plaintiff

v.

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* 12-cv-00364-SM
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Warden Edward Reilly, Chaplain Dana Hoyt,
Scott Watson, John Massey, Shanon Berwick
Defendants

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**STATE DEFENDANTS' OBJECTION TO PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT**

NOW COME Warden Edward Reilly, Chaplain Dana Hoyt, Lts. John Massey and Shanon Berwick, and Corrections Officer Scott Watson (together the "State Defendants") by and through their counsel, the Office of the Attorney General, and submit this Objection to Plaintiff's Motion for Summary Judgment:

1. For the reasons stated in the State Defendants' Cross-motion for Summary Judgment and supporting memorandum of law (ECF Doc. 20) the State Defendants object to Plaintiff, Dominic Ali's Motion for Summary Judgment (ECF Doc. 17).

2. The State Defendants' Cross-motion for Summary Judgment and supporting memorandum shall be incorporated herein.

WHEREFORE, the Defendant respectfully requests that this Honorable Court:

- A. Deny Plaintiff's Motion for Summary Judgment;
- B. Grant Defendant's Cross-Motion for Summary Judgment; and
- C. Grant any additional relief that is just and equitable.

Respectfully submitted,

By their attorneys,

JOSEPH A. FOSTER
Attorney General

Date: August 22, 2013

/s/ Francis C. Fredericks
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed this 22nd day of August 2013, postage prepaid, to:

Dominic S. Ali, # 81829
Northern NH Correctional Facility
138 E Milan Rd.
Berlin, NH 03570

/s/ Francis C. Fredericks
Francis C. Fredericks